

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	No. 3:10-CR-073-K
	§	
Tito Miller Parra-Isaza (07)	§	
aka Miguel Angel	§	
aka Juan Pablo Leyba	§	

FACTUAL RESUME

Tito Miller Parra-Isaza ("Parra-Isaza"), defendant, Hugo Aguilar, the defendant's attorney, and the United States of America, agree that the following facts are true and correct and may be submitted to the Court in support of Parra-Isaza's guilty plea to Count Three of the Indictment:

ELEMENTS OF THE OFFENSE

Violation of 18 U.S.C. § 1956(h)

- First: That a conspiracy existed between at least two non-government persons to launder monetary instruments;
- Second: That Parra-Isaza knew of the conspiracy; and
- Third: That Parra-Isaza intentionally participated in the conspiracy in that he joined it willfully, that is, with the intent to further its unlawful purpose.

STIPULATED FACTS

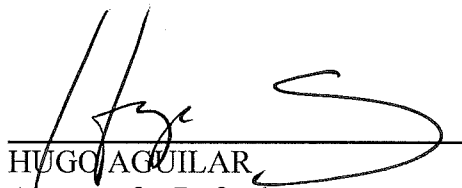
Beginning in or about October 2006, the exact date being unknown, and continuing to on or about December 1, 2007, in the Dallas Division of the Northern District of Texas, and elsewhere, Parra-Isaza, knowingly and willfully combined, conspired, confederated, and agreed with Horley Rengifo-Pareja, a.k.a. "Harry," Jenny Vivian Hurtado-Beltran, FNU LNU, a.k.a. "El Mono," and Joaquin Alejandro Senderos, and others to commit offenses against the United States in violation of Title 18, United States Code, Sections 1956 and 1957.

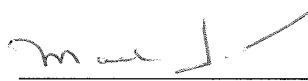
In furtherance of the conspiracy, Parra-Isaza had meetings with Rengifo-Pareja and others to discuss the laundering of bulk cash, which were the proceeds of unlawful activity, namely, drug smuggling in violation of 21 U.S.C. §§ 952 and 960.

Parra-Isaza's role in the conspiracy was to coordinate the deposit of bulk cash, which was the proceeds of drug smuggling, into financial institutions in Mexico and elsewhere. In furtherance of the conspiracy, this bulk cash was later wire transferred to bank accounts in the Dallas, Texas. These funds were then transported to Panama and elsewhere to distribute to individuals involved in drug smuggling.

AGREED TO AND SIGNED this 7 day of May, 2015.


TITO MILLER PARRA-ISASZA
Defendant


HUGO AGUILAR
Attorney for Defendant


MARK IRISH
U.S. Department of Justice
Asset Forfeiture and Money Laundering Section
1400 New York Avenue, N.W. Ste. 10100
Washington, D.C. 20530
(202) 514-1263 (telephone)
(202) 514-2255 (facsimile)
mark.irish2@usdoj.gov